

UNITED STATES OF AMERICA  
U.S. DISTRICT COURT -- EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

MICHIGAN URGENT CARE &  
PRIMARY CARE PHYSICIANS, P.C.,

Plaintiff,

-vs-

2:16-cv-11463-MAG-SDD

NOVARTIS PHARMACEUTICALS  
CORPORATION, ALCON LABORATORIES,  
INC., and JOHN DOES 1-10,

Defendants.

**JOINT MOTION TO STAY IN LIGHT OF SETTLEMENT**

Plaintiff Michigan Urgent Care & Primary Care Physicians, P.C. (“Plaintiff”) and Defendants Alcon Laboratories, Inc. and Novartis Pharmaceuticals Corporation (collectively “Defendants”), by their respective undersigned counsel, jointly move the Court to stay all of the deadlines in this case to facilitate completion of settlement. The parties have reached a settlement in principle and agree that the case should be stayed for thirty days to enable them to finalize and execute a written settlement agreement.

The parties expect that they will finalize the settlement agreement and Plaintiff anticipates filing a voluntary dismissal of all of its individual claims with prejudice and all its class claims without prejudice within the next thirty days. For

these reasons, the parties move the Court for entry of an Order staying all deadlines for thirty days, and granting such other and further relief as the Court deems necessary or appropriate.

Dated: July 17, 2017

Respectfully submitted,

**ALCON LABORATORIES, INC.  
and NOVARTIS  
PHARMACEUTICALS  
CORPORATION**

**MICHIGAN URGENT CARE &  
PRIMARY CARE PHYSICIANS,  
P.C.**

By: /s/ Francis A. Citera  
One of Defendants' Attorneys

By: /s/ Daniel A. Edelman  
One of Plaintiff's Attorneys

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**CERTIFICATE OF SERVICE**

I, Francis A. Citera, an attorney, certify that I electronically filed this **JOINT MOTION TO STAY** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the parties of record on this 17<sup>th</sup> day of July, 2017.

/s/ Francis A. Citera

Francis A. Citera